

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MELISSA ENG-HATCHER, on behalf of
herself and all others similarly situated,

Plaintiff,

v.

SPRINT NEXTEL CORPORATION;
SPRINT/UNITED MANAGEMENT
COMPANY; and DOES 1 through 10,
inclusive,

Defendants.

CASE NO.07-CV-7350 (BSJ)(KNF)

**DECLARATION OF GERALD D.
WELLS, III IN SUPPORT OF
MOTION TO COMPEL**

GERALD D. WELLS, III, declares as follows:

1. I am associated with the law firm of Schiffrin Barroway Topaz & Kessler, LLP (“SBTK” or the “Firm”), counsel for Plaintiff in this action, and have been admitted *pro hac vice* to practice before this Court. I am personally involved in all aspects of the prosecution of this matter. I submit this declaration in support of Plaintiff’s motion to compel discovery from Defendants.

2. Attached hereto as Exhibit A is a true and correct copy of Plaintiff’s First Request for Production of Documents Addressed to Defendants, dated and served on or about April 3, 2008.

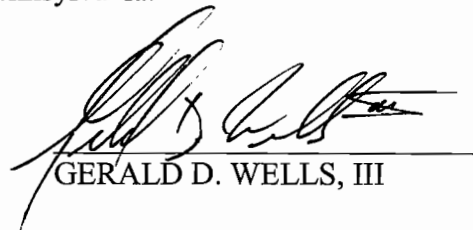
3. Attached hereto as Exhibit B is a true and correct copy of a letter, dated May 22, 2008, from Ashley R. Hurst, Esq. to Robert W. Biela, Esq.

4. Attached hereto as Exhibit C are true and correct copies of various discovery-related communications between the parties.

5. Attached hereto as Exhibit D is a true and correct copy of an email, dated June 24, 2008 at 5:08 p.m., from Elise M. Bloom, Esq. to the undersigned

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 14, 2008, in Radnor, Pennsylvania.



GERALD D. WELLS, III